



Jim McCarson
Vice President – Corporate Administration

September 27, 2013

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Attention: Chief, Wireline Competition Bureau

Re: **WC Docket No. 10-90**
Challenge to Windstream's Request for Connect America Fund Phase I Round 2 Support

Dear Ms. Dortch:

North State Telephone Company d.b.a. North State Communications ("North State" or "Company") of North Carolina hereby files this challenge to Windstream's request to receive support in the second round of the Connect America Fund Phase I ("CAF Phase I Round 2") to provide broadband service to locations in census block 370570619023037. North State currently provides broadband service at or above 3 Mbps download, 768 kbps upload in this census block, and the Company respectfully requests that the Wireline Competition Bureau take into consideration the evidence provided herein as it makes its final determinations about which census blocks are ultimately eligible to receive CAF Phase I Round 2 support.

On August 28, 2013, the Federal Communications Commission ("FCC") released a Public Notice (DA 13-1832) which instructed interested parties "to challenge price cap carrier's Phase I deployment plans by demonstrating that a block in question is already served by fixed Internet access with the requisite speeds."¹ The Public Notice included a list of all census blocks that the price cap carriers are requesting to receive CAF Phase I Round 2 support to provide broadband. North State has reviewed this list and identified census blocks in the attached list that should not be eligible for CAF Phase I Round 2 support because the Company already provides broadband in those blocks at a speed of at least 3 Mbps/768 kbps.

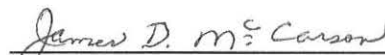
¹ Wireline Competition Bureau Publishes Census Blocks, and Commences Challenge Process, for Second Round of Connect America Fund Phase I, WC Docket No. 10-90, Public Notice, DA 13-1832 (rel. August 28, 2013) ("*August 28 Public Notice*").

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I, James D. McCarson, Vice President of Corporate Administration at North State hereby certify under penalty of perjury that North State provides broadband in census block 370570619023037. North State understands that Windstream is requesting CAF Phase 1 Round 2 support in this census block. However, this census block is located entirely within North State's ILEC study area, and North State provides broadband at or above 3 Mbps/768 kbps throughout the census block. The Company offers to make billing records available to the FCC upon request and includes the map in Attachment A to illustrate that the census block is entirely within North State's study area.

In conclusion, North State urges the FCC to eliminate the census blocks listed below from CAF Phase 1 Round 2 eligibility.

Respectfully submitted,



James D. McCarson
Vice President, Corporate Administration

JDM:rj

cc: Ryan Yates, Wireline Competition Bureau, Telecommunications Access Policy Division

Enclosures

ATTACHMENT B:
SUPPORTING EVIDENCE

Pursuant to the rules for the challenge process established in the FCC's May 22 Report and Order, "All filings...must be supported by some form of documented evidence." North State submits as evidence the following map illustrating the Company's service area and broadband availability.

The map below shows that census block 370570619023037 is entirely in North State's ILEC territory.

